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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA, ) No. 4:21-cr-00005-RRB-SAO  
                                  )  
                                  )  
Plaintiff,                    )  
                                  )  
                                  )  
vs.                            )  
                                  )  
                                  )  
ROGER KEELING,             )  
                                  )  
                                  )  
Defendant.                    )

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**UNITED STATES' BAIL MEMORANDUM**

Defendant, who was charged by the Grand Jury in January of 2021 with stalking, has been charged in a superseding indictment with an additional count alleging that he violated 18 U.S.C. § 1958 by using a means or facility of interstate or foreign commerce with the intent that a murder be committed in exchange for money or other items of pecuniary value. The Government files this bail memorandum to provide the Court with additional facts relating to the charge to aid in the Court's bail analysis. FBI Special

Agent Derik Stone or another agent or investigator involved in the investigation will be available to testify to these facts if needed at an initial appearance or detention review hearing.

A woman identified in Court documents as “Victim 1” contacted the Troopers in late October of last year to report that Keeling, her boyfriend of three years, had strangled her and threatened to burn her house down. Keeling was charged with assault and pled guilty soon thereafter. Victim 1 sought a protective order in state court, which the court granted. Over the course of the following months, Keeling violated this order numerous times.

Many of these violations consisted of a series of over twenty e-mails that purported to be from people who knew Keeling. One of them caused Victim 1 grave concern because it stated that the purported sender had watched Victim 1 “smiling and enjoying the amenities” at a resort near Denali National Park. Law enforcement determined Keeling was the sender of all of these e-mails because (1) the writing style was similar to known e-mails from Keeling, including double periods at the end of sentences, (2) the e-mails referenced relationship information that Keeling would have known, (3) Keeling used his own personal known e-mail as a backup to one of the addresses, (4) Keeling e-mailed Instagram photos of himself and Victim 1 from his personal address to another address, which were almost immediately forwarded to Victim 1 from that other account, and (5) IP data established that some of the unknown accounts

sent e-mails to Victim 1 from the same IP address commonly accessed by Keeling's own account.

Keeling violated the order in other ways as well. He slashed Victim 1's tires. He directly contacted her parents, who live in the Lower 48. After he was arrested for some of these other violations and released on bail, he also left a small bag containing handwritten notes purporting to "curse" her on her running route. Law enforcement was able to determine that Keeling was the one who left the bag for Victim 1 to find by reviewing GPS information gathered by pretrial services. Keeling admitted this when law enforcement confronted him, and he was arrested and remanded to the Fairbanks Correctional Center.

Law enforcement learned from a fellow inmate about a murder for hire plot against Victim 1. The results of the law enforcement investigation indicate that in conversations with the inmate, Keeling expressed a great deal of anger toward Victim 1 and repeatedly said he wanted her dead. The other inmate, in an effort to get Keeling to stop talking about it, told Keeling that he "knew a guy" who could take care of Victim 1.

Keeling responded enthusiastically. He provided the cell mate with written details about Victim 1's schedule and contact information, which Victim 1 later verified were accurate, and promised him a "finders fee" of about \$1,500. Keeling was once again released on bail, and after his release he transferred part of this finders fee to the other inmate's mother using an internet banking application. The FBI was able to confirm the transaction by viewing the recipient's bank records. Keeling also provided specific

instructions for the best time and manner for completing the hit. During a subsequent search at Keeling's house, law enforcement found documents referencing payments to the other inmate for "the job" they had talked about in jail and a hand drawn floor plan of Victim 1's house.

Thankfully, Keeling's fellow inmate promptly brought the matter to the attention of law enforcement. However, Defendant's conduct over the last four months demonstrates that he poses a clear and present danger to Victim 1's life. Probation, restraining orders, GPS monitoring, and even custody have failed so far to prevent him from placing Victim 1 in fear for her life and making arrangements to kill her. No combination of conditions could successfully ensure her safety, so the Court should order his continued detention.

RESPECTFULLY SUBMITTED February 19, 2021, in Fairbanks, Alaska.

BRYAN SCHRODER  
United States Attorney

s/ Daniel Doty  
DANIEL DOTY  
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United States of America

## CERTIFICATE OF SERVICE

I hereby certify that on February, 19 2021, a true and correct copy of the foregoing was served electronically defense counsel via ECF

s/ Daniel Doty  
Office of the U.S. Attorney